

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA

Plaintiff,

v.

COMMONWEALTH OF PUERTO RICO,
et. al.

Defendants.

CIVIL NO. 12-2039 (GAG)

MOTION TO RESTRICT

TO THE HONORABLE COURT:

COME NOW the COMMONWEALTH OF PUERTO RICO and the PUERTO RICO POLICE DEPARTMENT, through the undersigned counsel, and respectfully allege and pray as follows:

1. On this same date, the appearing Defendants will file a protective order. On July 21, 2017, this Court entered a docket order pertaining to a separate matter involving the TCA's methodology for a study on crowd control policies and practices that reads, in pertinent part, as follows: "*All filings pertaining to this, or any pending matter, until reviewed and ruled upon by the court shall be filed in restricted mode. This applies to the parties and TCA.*" See Dkt. No. 567 (emphasis added). In compliance with the Court's Order and in abundance of caution, and in compliance with Standing Order No. 9, the appearing party respectfully requests that they be allowed to file the aforementioned document under seal and limit its viewing to case participants only.

WHEREFORE, it is respectfully requested from this Honorable Court to take notice of the above stated and that they be allowed to file the aforementioned document under seal and limit its viewing to case participants only.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on August 3, 2017.

WANDA VÁZQUEZ GARCED
Secretary of Justice

WANDYMAR BURGOS VARGAS
Deputy Secretary in Charge of
Litigation
Department of Justice

SUSANA PEÑAGARÍCANO BROWN
Director of Federal Litigation
and Bankruptcy Division

S/JOEL TORRES ORTIZ
Joel Torres Ortiz
U.S.D.C. NO. 302311
Federal Litigation Division
Department of Justice

P.O. Box 9020192
San Juan, P.R., 00902-0192
Tel. (787) 721-2900, ext. 2647,2650,2624,2606
Fax (787) 723-9188
joeltorres@justicia.pr.gov